



U.S. Department of Energy
Office of River Protection

0059923

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03-ED-103

JUL 23 2003

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

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Dear Mr. Wilson:

EDMC

**AGREEMENT TO LINK SECONDARY CONTAINMENT PERMIT DESIGN PACKAGES
WITH PRETREATMENT FACILITY WALLS**

- References:
1. WA7890008967, "Dangerous Waste Portion of the Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Chapter 10, and Attachment 51, 'Waste Treatment and Immobilization Plant.'"
 2. State of Washington Department of Ecology, "Fact Sheet for the Hanford Facility Resource Conservation and Recovery Act Draft Permit for the Treatment, Storage, and Disposal of Dangerous Waste," Ecology Publication Number 01-05-006.
 3. BNI meeting minutes from the May 19, 2003, Dangerous Waste Permit Integration Meeting, CCN 057115.
 4. BNI meeting minutes from the June 2, 2003, Dangerous Waste Permit Integration Meeting, CCN 057116.

The purpose of this letter is to obtain formal concurrence from the State of Washington Department of Ecology (Ecology) with a modified approach to construction and permitting for the Waste Treatment and Immobilization Plant Pretreatment Facility.

The Dangerous Waste Permit (Reference 1) requires submittal of design information prior to the installation of secondary containment for tank systems and miscellaneous treatment unit systems. U.S. Department of Energy (DOE) and Bechtel National, Inc. (BNI) have been submitting permit design packages for secondary containment and have constrained wall installation with approval of the permit design package by Ecology. This followed the approach advanced by Ecology described in the Permit's fact sheet (Reference 2), where information was to be submitted on a system and elevation basis.

At the May 19, 2003, integration meeting among the DOE, Office of River Protection (ORP), BNI, and Ecology, a discussion was held regarding how some floors would be installed at the Pretreatment Facility (Reference 3). Under the identified construction approach, walls are constructed independent of floors. Floors are installed as required, following installation of plant

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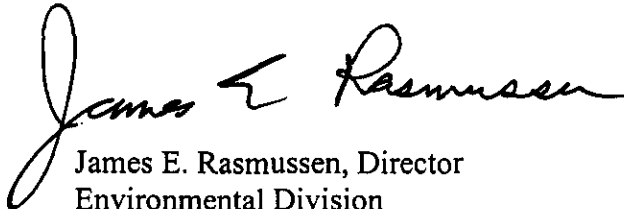
items such as vessels, pipe, and other ancillary equipment. A proposal was made that tank system and miscellaneous treatment unit system secondary containment permit design packages would not constrain the erection of walls, but would constrain the installation of floors. Subsequently, Ecology staff informally concurred that constraining the installation of floors with secondary containment permit design packages is more appropriate than constraining the installation of walls (Reference 4).

ORP and BNI seek to document this agreement and request Ecology's concurrence for the following:

- Regulated wall construction for the Pretreatment Facility will be allowed to proceed to full height based on the below grade and Elevation 0 containment package approvals; and
- Specific containment package approval will be tied to each facility floor with approval required prior to construction of each particular floor structure.

If you have any questions, please contact Lori A. Huffman, Environmental Division, (509) 376-0104.

Sincerely,



James E. Rasmussen, Director
Environmental Division

ED:LAH

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